

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

Received
JUN 10 2014
Copyright Royalty Board

In the Matter of)
)

Distribution of the 2004, 2005, 2006)
2007, 2008 and 2009)
Cable Royalty Funds)
)

Docket No. 2012-6 CRB CD 2004-2009
(Phase II)

In the Matter of)
)

Distribution of the 1999-2009)
Satellite Royalty Funds)
)

Docket No. 2012-7 CRB SD 1999-2009
(Phase II)

AFFIDAVIT ACCOMPANYING REDACTED RESTRICTED INFORMATION

Pursuant to 37 C.F.R. § 350.4(e) and Paragraph 11(b) of the proposed Protective Order submitted by the Phase II Parties in the referenced proceedings on June 5, 2014, the undersigned hereby submits this affidavit in support of the redacted version of MPAA-represented Program Suppliers' Motion to Compel Production Of Underlying Documents From Independent Producers Group, filed with the Copyright Royalty Judges on June 16, 2014. The undersigned hereby represents that (i) she is authorized to submit this affidavit on behalf of the MPAA-represented Program Suppliers; (ii) she has reviewed the redactions set forth in the Redaction Log attached hereto as Exhibit 1; and (iii) to the best of her knowledge, information and belief, and based on the representations made by counsel for Independent Producers Group in connection with his Responses and Follow-Up Responses to MPAA's discovery requests in these proceedings, the redacted information meets the definition of Restricted information at the time

this Affidavit was made, and good cause exists for the treatment of the information as Protected Materials.

Executed this 16th day of June, 2014, in Washington, D.C.

Lucy Holmes Plovnick
Lucy Holmes Plovnick

EXHIBIT 1

REDACTION LOG ACCOMPANYING MPAA-REPRESENTED PROGRAM SUPPLIERS'
MOTION TO COMPEL PRODUCTION OF UNDERLYING DOCUMENTS FROM
INDEPENDENT PRODUCERS GROUP

Exhibits G, I, and K to MPAA-represented Program Suppliers' Motion to Compel Production Of Underlying Documents From Independent Producers Group contain documents and electronic data that IPG produced to MPAA-represented Program Suppliers and designated as "RESTRICTED" documents subject to the proposed Protective Order in this proceeding. MPAA-represented Program Suppliers have therefore redacted Exhibits G, I, and K from the public version of their filing.

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of June, 2014, a copy of the foregoing document was sent by overnight mail to the parties listed on the attached service list.

Lucy Holmes Plovnick
Lucy Holmes Plovnick

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